

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Ref. Nos. 20030, 23341 & 29058

**CERTIFICATION OF COUNSEL**

I, Matthew R. Pierce, counsel to FTX Recovery Trust<sup>2</sup>, hereby certify as follows to the best of my knowledge, information and belief:

1. On or about August 12, 2020, Alameda Research Ltd. (“Alameda”) and Tai Mo Shan Limited (“Tai Mo Shan”) entered into a Master Loan Agreement and Initial Loan Confirmation-2 thereunder (together, the “Agreement”)<sup>3</sup>.

2. On June 28, 2023, Tai Mo Shan filed a proof of claim against Alameda (Claim No. 5475), which Tai Mo Shan amended on May 15, 2024 (Claim No. 94967), and further amended on July 3, 2024 (Claim No. 95768) (collectively, the “Claims”).

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<sup>1</sup> The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

<sup>2</sup> The FTX Recovery Trust (a/k/a the Consolidated Wind Down Trust) was established on January 3, 2025, the effective date of the Debtors’ confirmed *Second Amended Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and its Debtor Affiliates* [D.I. 26404-1].

<sup>3</sup> The Parties also entered into that certain Initial Loan Confirmation. See Master Loan Agreement Ex. A. The Initial Loan Confirmation and the Parties’ respective rights and obligations, if any, with respect thereto are not subject to or otherwise affected by this Stipulation.

3. On July 10, 2024, the above captioned debtors and debtors in possession (collectively, the “Debtors”) filed the *Debtors’ Objection to Proofs of Claim Filed by Tai Mo Shan Limited* [D.I. 20030] (the “Objection”).

4. On August 19, 2024, Tai Mo Shan filed the *Response of Tai Mo Shan Limited to Debtors’ Objection to Proofs of Claim Filed by Tai Mo Shan Limited* [D.I. 23341] (the “Response”).

5. On December 23, 2024, the Debtors filed the *Motion of Debtors for Entry of an Order Authorizing the Debtors; Assumption of Certain Agreements* [D.I. 29058] (the “Motion”) authorizing the Debtors to assume the Agreements in accordance with 11 U.S.C. § 365(a).

6. The FTX Recovery Trust and Tai Mo Shan (together, the “Parties”), by and through their respective counsel, have engaged in good faith discussions and have stipulated to entry of an order (the “Proposed Order”), attached hereto as Exhibit A, granting the Motion disallowing and expunging the Claims, as memorialized in the *Stipulation with Respect to the Debtors’ Motion for Entry of an Order Authorizing Assumption of Certain Agreements with Tai Mo Shan Limited* (the “Stipulation”) and approving the Stipulation. Attached as Exhibit 1 to the Proposed Order is the Stipulation, as agreed to by and among the Parties.

7. The Parties have no objection to the entry of the Proposed Order. In accordance with the Court’s electronic order processing procedures, a copy of the Proposed Order shall be uploaded to CM/ECF.

8. Accordingly, the FTX Recovery Trust respectfully requests that the Court enter the Proposed Order at its earliest convenience.

Dated: February 13, 2025  
Wilmington, Delaware

**LANDIS RATH & COBB LLP**

/s/ Matthew R. Pierce

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